

# **EXHIBIT B**

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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION  
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12 IN RE CHRYSLER-DODGE-JEEP  
13 ECODIESEL® MARKETING, SALES  
14 PRACTICES, AND PRODUCTS  
15 LIABILITY LITIGATION

16 DORU BALI, *et al.*, on behalf of themselves and  
17 all others similarly situated,

18 Plaintiffs,

19 v.

20 FIAT CHRYSLER AUTOMOBILES N.V., FCA  
21 US LLC, SERGIO MARCHIONNE, VM  
22 MOTORI S.p.A., VM NORTH AMERICA,  
INC., ROBERT BOSCH GmbH, and ROBERT  
BOSCH LLC,

23 Defendants.  
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MDL 2777 EMC

**SUPPLEMENTAL DECLARATION OF  
STEVEN WEISBROT OF ANGEION  
GROUP, LLC IN SUPPORT OF  
MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT**

1 I, Steven Weisbrot, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746  
2 that the following is true and correct:

3 1. I am a partner at the class action notice and settlement administration firm, Angeion  
4 Group LLC (“Angeion”). I am fully familiar with the facts contained herein based upon my  
5 personal knowledge.

6 2. My credentials have been previously reported to this Court in my initial declaration  
7 which was filed with Plaintiffs’ Motion for Preliminary Approval of Class Settlement and  
8 Direction of Notice Under Fed. R. Civ. P. 23(e) (Dkt. No. 491) (the “Original Declaration”).

9 3. The purpose of this declaration is to provide the Court with an updated summary of  
10 the work performed related to the Notice Program as outlined in the Declaration of Steven Weisbrot  
11 of Angeion Group, LLC in Support of Motion for Final Approval of Class Action Settlement (Dkt.  
12 No. 538-3).

13 **I. CAFA NOTICE**

14 4. Angeion has been advised that on January 15, 2019, the FCA and Bosch Defendants  
15 caused Notice of this Settlement and related materials to be sent to the Attorneys General of all  
16 states, the Attorneys General of the District of Columbia, Guam and Puerto Rico, as well as the  
17 Attorney General of the United States, pursuant to the requirements of 28 U.S.C. § 1715 (“CAFA  
18 Notice”). The Defendants provided Angeion with a copy of the CAFA Notice that was sent, which  
19 is attached hereto as Attachment “1.”

20 **II. DIRECT NOTICE**

21 **Class List**

22 5. Between February 5, 2019 and February 21, 2019, Angeion received email and  
23 mailing address data of potential Class Members from FCA. Prior to disseminating Notice of the  
24 Settlement (“Notice”), Angeion reviewed and processed the data files to remove exact duplicative  
25 records and finalize the mailing list.

26 **Mailed Notice**

27 6. Between February 19, 2019 and February 23, 2019, Angeion caused 137,637  
28 Notices to be mailed via the United States Postal Service (“USPS”) first-class mail, postage

1 prepaid. Prior to mailing, the mailing list was processed via the USPS National Change of Address  
2 (“NCOA”) database to identify updated address information for individuals and businesses who  
3 have moved in the last four years and who filed a change of address card with the USPS. The  
4 mailed Notices were in the same form as Attachment “2” attached hereto.

5 7. As of April 25, 2019, the USPS has returned 5,007 of the Notices as undeliverable.  
6 Notices returned as undeliverable by the USPS without a forwarding address were processed  
7 through address verification searches and re-mailed to updated addresses located via this process.  
8 Notices returned as undeliverable by the USPS with a forwarding address were re-mailed to that  
9 forwarding address identified by the USPS. As a result of the above-described efforts, a total of  
10 3,071 Notices have been re-mailed. Of the re-mailed Notices, only 165 were returned by the USPS  
11 a second time. In summary, of the 137,637 Notices Angeion mailed to potential Class Members,  
12 135,536 (98.47%) are presumed to have been successfully delivered. Angeion will continue to  
13 receive, process, and re-mail undeliverable Notices in accordance with the above-described  
14 processes.

#### 15 **Email Notice**

16 8. Between February 19, 2019 and February 26, 2019, Angeion caused 123,128  
17 Notices to be emailed. The email Notices were in the same form as Attachment “3” attached hereto.  
18 The Notices were optimized for readability both on computer screens and mobile devices.

19 9. Prior to sending the Notices via email, the email addresses provided by FCA were  
20 subjected to the “Hygiene and Verification” process and email append process as described in my  
21 Supplemental Declaration (Dkt. No. 525-1) at paragraphs 20–23.

22 10. Any email Notices that were not delivered as a result of a soft bounce, were  
23 re-attempted after an approximate 12 to 24-hour rest period, which allowed any temporary block at  
24 the ISP level to expire. A soft bounce is a temporary delivery failure. Soft bounces can occur for a  
25 number of reasons including when the recipient's mailbox is full; the receiving server is down or  
26 swamped with messages; the message size is too large; the recipient’s settings do not allow for  
27 email from the sender; suspicious content has been detected; or various other reasons. It does not  
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1 necessarily mean that the email address is invalid or no longer active, which are generally  
2 categorized as “hard bounces.” In total, 115,824 email Notices were successfully delivered, which  
3 represents a 94.07% deliverability percentage. This deliverability percentage is excellent  
4 compared to comparable class action notice programs.

### 5 **III. MEDIA & PUBLICATION NOTICE**

#### 6 **Targeted Facebook Campaign**

7 11. On February 13, 2019, Angeion caused the targeted Facebook campaign to  
8 commence. The Facebook campaign displays targeted ads to potential Class Members’ Facebook  
9 timelines based on email addresses provided by FCA and obtained via the email append work  
10 referenced in paragraph 9 above. Angeion was able to target ads to Class Members based on the  
11 vehicle they were associated with. For example, if a Class Member was likely to be a current or  
12 former Jeep EcoDiesel owner or lessee, they received an ad targeted specifically to the Jeep brand.  
13 Copies of the customized Facebook ads are attached hereto as Attachment “4.”

14 12. The Notice portion of the Facebook campaign initially ran for a total of 45-days,  
15 from February 13, 2019 until March 29, 2019.

16 13. As a result of the first 45-day run, the targeted Facebook campaign served 625,214  
17 impressions to the Ram audience and 190,476 impressions to the Jeep audience. The impressions  
18 described herein have resulted in 26,909 click-throughs for the Ram audience and 8,981  
19 click-throughs for the Jeep audience.

20 14. Given that the targeted Facebook campaign garnered exceptional click-through  
21 rates that greatly exceed other similar campaigns, with the advice and consent of the Parties,  
22 Angeion extended the targeted Facebook campaign beyond the first 45 days of the Notice Program  
23 to further generate class member engagement.

24 15. The extended targeted Facebook campaign will continue until the beginning of the  
25 Settlement Benefit Period, when the second 45-day Facebook campaign commences. *See* Dkt. No.  
26 525-1 at ¶ 30. In other words, the highly successful Facebook campaign will have essentially run  
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1 from preliminary approval of the settlement through 45 days past the opening of the Settlement  
2 Benefit Period.

3 16. As of April 25, 2019, an additional 139,531 impressions have been served to the  
4 Ram audience and 40,851 additional impressions served to the Jeep audience through Facebook.  
5 This has resulted in an additional 5,354 click-throughs for the Ram audience and 1,668  
6 click-throughs for the Jeep audience. In total, Angeion has served 966,492 impressions, resulting in  
7 42,912 total click-throughs thus far, and will continue to serve impressions targeting consumers  
8 through the first 45 days of the Settlement Benefit Period.

9 **Internet Search Targeting Campaign**

10 17. On February 15, 2019, Angeion caused the internet banner ad campaign to  
11 commence. Similar to the Facebook campaign, the internet banner ad campaign ran for a total of  
12 45-days and concluded on March 29, 2019. A second 45-day campaign will commence at the  
13 beginning of the Settlement Benefit Period.

14 18. As described in my Supplemental Declaration (Dkt. No. 525-1) at paragraphs 31-36,  
15 the internet banner ad campaign is specifically designed to target the most appropriate audiences to  
16 deliver Notice of this Settlement, utilizing both Ram-specific and Jeep-specific ads. Copies of the  
17 banner ads are attached hereto as Attachment "5."

18 19. In total, the internet banner campaign caused 603,798 impressions to be served  
19 utilizing the Ram-specific ad and 333,056 impressions served utilizing the Jeep-specific ad. The  
20 impressions described herein have resulted in 1,866 click-throughs for the Ram audience and 1,425  
21 click-throughs for the Jeep audience.

22 **Summary of Digital & Social Media Campaigns**

23 20. The level of engagement for the digital and social media advertising campaigns are  
24 notably above average when compared to other consumer class action settlements. In particular, the  
25 Facebook campaign's click-through rate is considerably more robust than industry averages and  
26 will continue to drive potential Class Members to the dedicated case website to learn more about  
27 the Settlement. It is my opinion that the Facebook ads in this case acted as an additional form of  
28

1 direct notice (as opposed to publication notice) because the ads were targeted to actual known Class  
2 Members, and the customized messaging was tailored to the Class Member's vehicle.

### 3 **Publication Notice**

4 21. Angeion caused Notice to be published in the March 4, 2019 edition of *Automotive*  
5 *News* and in the April 7, 2019 edition of *Motor*. A copy of the publication Notice text used for  
6 publication in the *Automotive News* and *Motor* is attached hereto as Attachment "6."

### 7 **IV. ADDITIONAL FORMS OF NOTICE**

8 22. Notice of the Settlement is also available to Class Members via the official  
9 settlement website: [www.ecodieselsettlement.com](http://www.ecodieselsettlement.com). The Settlement website contains a wealth of  
10 information, including a detailed summary of the Settlement, an overview of the claims submission  
11 process, a repository of the Settlement-related documents and court filings, a list of Frequently  
12 Asked Questions, and an option for interested Class Members to register for Settlement updates via  
13 email.

14 23. In addition, FCA has posted links to the official Settlement website on  
15 [www.jeep.com](http://www.jeep.com) and [www.ramtrucks.com](http://www.ramtrucks.com), the official brand websites for the vehicle brands in this  
16 case. Linking to the Settlement website on an official FCA webpage is highly beneficial for two  
17 reasons. First, it helps diffuse news of the Settlement on a website where Class Members are likely  
18 to visit. Second, the links create a credible network of "backlinks," which serve an important role in  
19 search engine optimization ("SEO") for the Settlement website and can help boost the organic  
20 ranking of a website in a search engine result. "Backlinks" are generally defined as a hyperlink that  
21 links from an external webpage to the subject webpage—in this case the Settlement website.  
22 Generally speaking, the better the quality of the backlinks, the greater the effect on SEO, which in  
23 turn makes a website easier to find through a search engine such as Google or Bing. As such,  
24 Angeion believes that the links on the official Jeep and Ram brand websites are helping to propel  
25 additional traffic to the Settlement website.

1     **V. CLASS MEMBER RESPONSE**

2           24. Class Members have shown a strong, prolonged engagement rate in response to the  
3 Notice Program that exceeds the response Angeion has seen in other consumer cases.

4           25. As of April 25, 2019, there have been 80,989 unique visitors to the Settlement  
5 website.

6           26. As of April 25, 2019, a total of 33,804 unique email addresses have registered on the  
7 Settlement website to receive email updates on the Settlement. This figure is a testament to the  
8 wide-reaching success of the Notice Program and the Class's interest in the settlement.

9           27. In my opinion, this is a very high engagement rate for Class Members, especially  
10 given that the Settlement Benefit Period has not yet begun and will remain open for two years after  
11 commencement. The Notice Program has generated substantial interest in the Settlement and is  
12 designed to continue to do so throughout the pendency of its administration.

13     **VI. OPT OUT REQUESTS**

14           28. As of April 25, 2019, Angeion has received a total of 3,461 non-duplicative opt out  
15 requests. These opt out requests account for a total of 3,447 unique vehicle identification numbers  
16 ("VIN"). The total number of compliant opt out requests is 3,046 (discussed in greater detail  
17 below).

18           29. Of the 3,461 non-duplicative opt out requests, 415 requests are deficient. The 415  
19 deficient opt out requests consist of (i) 171 requests submitted for individuals who claim to have  
20 sold their vehicles before the January 12, 2017 Notice of Violation or after the January 10, 2019  
21 Settlement date, and are therefore not members of the class, and (ii) 244 requests that are  
22 incomplete and do not meet the opt out requirements set forth in Paragraph 6.1 of the Settlement  
23 Agreement and Question 27 of the court-approved Long Form Notice. Finally, one of the submitted  
24 opt out requests was subsequently revoked and has been omitted from the total opt out count.

25           30. Angeion has contacted the individuals and counsel who submitted the deficient opt  
26 out requests to provide them with an opportunity to cure the deficiencies. Angeion will provide the  
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Parties with a final list of the valid and compliant opt outs prior to the May 3, 2019 Final Approval Hearing.

31. Of the opt out requests Angeion has received, 3,447 are for individuals represented by opt out counsel. Notably, 3,061 (88.4%) of the opt out requests were submitted through two law firms, Stern Law PLLC and Heygood Orr & Pearson. Angeion has also received 14 opt out requests for individuals who do not appear to be represented by opt out counsel, and Angeion is reaching out to these individuals to confirm. The table below provides a breakdown of the total number of opt outs submitted for individuals represented by opt out counsel (and the firm representing them) and those submitted for individuals without opt out counsel.

LAW FIRM	OPT OUTS SUBMITTED
STERN LAW PLLC	1,841
HEYGOOD ORR & PEARSON	1,220
CONSUMER LEGAL REMEDIES APC	234
DUCK LAW FIRM, LLC	59
WISE PLLC	39
LAW OFFICE OF SAMUEL W. BEARMAN LC	10
KNIGHT LAW GROUP LLP	13
STRATEGIC LEGAL PRACTICE	11
ROMANO STANCROFF PC	8
LEMON LAW GROUP	8
GROSSMAN LAW OFFICES	1
LAW OFFICE OF ILONA GORIN	1
LAW OFFICES OF JIM O. WHITWORTH	1
YOUNG & YOUNG APC	1
<b>TOTAL OPT OUT SUBMISSIONS WITH COUNSEL</b>	<b>3,447</b>
INDIVIDUAL (NO OPT OUT COUNSEL)	<b>14</b>
<b>TOTAL OPT OUT SUBMISSIONS</b>	<b>3,461</b>

32. Further, the table below provides the breakdown of non-duplicative opt outs by eligibility category.

ELIGIBILITY CATEGORY	NUMBER OF OPT OUTS
CURRENT OWNER	2,610
CURRENT LESSEE	53
FORMER OWNER	733
FORMER LESSEE	46
OPT OUT REQUEST DID NOT SPECIFY	19
<b>TOTAL</b>	<b>3,461</b>

1 **VII. CONCLUSION**

2 33. The Notice Program utilized and will continue to utilize every potential Class  
3 Member mailing address and email address reasonably available to effectuate direct notice, which  
4 has already reached the overwhelming majority of class members. When combined with the  
5 aforementioned digital, social and traditional media publication, the overall notification efforts  
6 greatly exceed the guidance of the Federal Judicial Center, comply with Due Process, this District's  
7 Local Rules, and the amended Rule 23.

8 34. Given the high deliverability rates for both the mail and email notice, combined with  
9 above average click through rates and initial registration participation rate, it is my opinion that the  
10 Notice Program has been and continues to be an overwhelming success, and has demonstrated  
11 meaningful, verifiable, Class Member participation and engagement in the Settlement. We expect  
12 this to continue as the Notice Program progresses.

13 35. In my opinion, the Notice Program described herein meets the requirements of Rule  
14 23 and due process requirements as the best notice practicable under the circumstances, and  
15 incorporated contemporary media and best practices to alert and engage the participation of the  
16 Class Members in the proposed Settlement.

17  
18 I hereby declare under penalty of perjury that the foregoing is true and correct.

19  
20 Dated: April 25, 2019

21   
22 STEVEN WEISBROT

# Attachment 1

January 15, 2019

Via Certified Mail

To: All Addressees Identified in the Attached Exhibit A

Re: Notice of Proposed Class Action Settlement Pursuant to the Class Action Fairness Act (28 U.S.C. § 1715): *In re Chrysler-Dodge-Jeep Ecodiesel Marketing, Sales Practices, and Products Liability Litigation*,  
MDL No. 2777

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Dear Sir or Madam:

On behalf of defendants Fiat Chrysler Automobiles N.V., FCA US LLC, VM Motori S.p.A., and VM North America, Inc. (collectively, "FCA") and Robert Bosch GmbH and Robert Bosch LLC (collectively, "Bosch") in the above-referenced putative class action (the "Class Action"), we write pursuant to 28 U.S.C. § 1715 ("CAFA") to notify you of a proposed settlement of the Class Action.

After extensive negotiations, including mediation by former Special Master of the September 11th Victim Compensation Fund, Kenneth Feinberg, the parties agreed to a resolution of the Class Action as set forth in a Consumer and Reseller Dealership Class Action Settlement Agreement and Release, dated January 10, 2019 (the "Proposed Settlement"). Under the terms of the Proposed Settlement, FCA and Bosch have agreed to compensate eligible class member owners, lessees, former owners, and former lessees, as set forth in the Proposed Settlement. On January 10, 2019, Plaintiffs filed a motion for preliminary approval of the Proposed Settlement.

The enclosed USB drive contains the documents required by 28 U.S.C. § 1715(b), including the following:

1. Consolidated Consumer Class Action Complaint, dated July 19, 2017; Amended Consolidated Consumer Class Action Complaint, dated September 29, 2017; and Second Amended Consolidated Consumer Class Action Complaint, dated May 16, 2018;
2. the Proposed Settlement and all attachments thereto, including proposed notifications to class members of the Proposed Settlement; and
3. the Court's January 15, 2019 Order relating to the proposed settlement and proposed notification to class members.

A hearing has been scheduled for January 23, 2019, at 10 a.m. PT to determine whether the Proposed Settlement should be preliminarily approved. The hearing to finally approve the Proposed Settlement is expected to occur in late April or May 2019.

CAFA also requires a defendant, “if feasible,” to provide “the names of class members who reside in each State and the estimated proportionate share of the claims of such members to the entire settlement,” or, if that is not feasible, to provide a “reasonable estimate of the number of class members residing in each State and the estimated proportionate share of the claims of such members to the entire settlement.” 28 U.S.C. § 1715(b)(7)(A)-(B). The attached Exhibit B contains FCA’s estimate of the number of Eligible Vehicles, as that term is defined in the Proposed Settlement, registered in each State. FCA believes that these figures provide a reasonable estimate of the number of class members per State and the “estimated proportionate share of the claims of such class members to the entire settlement.” 28 U.S.C. § 1715(b)(7)(A)-(B). Ultimately, these figures provide only a reasonable estimate of the total number of class members per State, and the actual numbers may later be determined to be different.

The foregoing information is provided based on the status of the proceedings at the time of the submission of this notification and on the information currently available to FCA and Bosch.

Sincerely,



William B. Monahan  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, New York 10016

*Counsel for Defendants Fiat Chrysler  
Automobiles N.V., FCA US LLC,  
VM Motori S.p.A., and  
VM North America, Inc.*

Sincerely,



Matthew D. Slater  
Cleary Gottlieb Steen & Hamilton LLP  
2112 Pennsylvania Avenue, NW  
Washington, DC 20037

*Counsel for Defendants  
Robert Bosch LLC and  
Robert Bosch GmbH*

(Enclosure)

cc: Elizabeth J. Cabraser, Esq.  
(Lief Cabraser Heimann & Bernstein LLP)  
*Plaintiffs' Lead Counsel*

**EXHIBIT A**

U.S. Department of Justice  
Office of the Attorney General of the  
United States  
950 Pennsylvania Avenue, NW  
Washington, DC 20530-0001

Office of the Attorney General of Alaska  
P.O. Box 110300  
Juneau, AK 99811-0300

Office of the Attorney General of Arkansas  
323 Center Street, Suite 200  
Little Rock, AR 72201-2610

Office of the Attorney General of Colorado  
Ralph L. Carr Colorado Judicial Ctr.  
1300 Broadway, 10th Floor  
Denver, CO 80203

Office of the Attorney General of Delaware  
Delaware Department of Justice  
Carvel State Building  
820 N. French St  
Wilmington, DE 19801

Office of Attorney General of Florida  
State of Florida  
The Capitol PL-01  
Tallahassee, FL 32399-1050

Office of the Attorney General of Guam  
590 S. Marine Corps Dr., Ste. 901  
Tamuning, GU 96913

Office of the Attorney General of Idaho  
700 W. Jefferson Street, Suite 210  
P.O. Box 83720  
Boise, ID 83720-0010

Office of the Attorney General of Indiana  
Indiana Government Center South  
302 W. Washington St., 5th Floor  
Indianapolis, IN 46204

Office of the Attorney General of Alabama  
P.O. Box 300152  
Montgomery, AL 36130-0152

Office of the Attorney General of Arizona  
2005 N Central Ave  
Phoenix, AZ 85004-2926

CAFA Coordinator  
Office of the Attorney General of California  
Consumer Law Section  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102

Office of the Attorney General of Connecticut  
55 Elm Street  
Hartford, CT 06106

Office of the Attorney General for the  
District of Columbia  
441 4th Street, NW  
Ste. 1100S  
Washington, DC 20001

Office of the Attorney General of Georgia  
40 Capitol Square, SW  
Atlanta, GA 30334

Department of the Attorney General of Hawaii  
425 Queen Street  
Honolulu, HI 96813

Office of the Attorney General of Illinois  
James R. Thompson Ctr.  
100 West Randolph Street  
Chicago, IL 60601

Office of the Attorney General of Iowa  
Hoover State Office Building  
1305 E. Walnut Street  
Des Moines, IA 50319

Office of the Attorney General Kansas  
120 SW 10th Ave., 2nd Floor  
Topeka, KS 66612-1597

Office of Attorney General of Louisiana  
P.O. Box 94005  
Baton Rouge, LA 70804

Office of the Attorney General of Maryland  
200 St. Paul Place  
Baltimore, MD 21202-2202

Office of the Attorney General of Michigan  
G. Mennen Williams Building, 7th Floor  
525 W. Ottawa St.  
P.O. Box 30212  
Lansing, MI 48909

Office of the Attorney General of Mississippi  
P.O. Box 220  
Jackson, MS 39201

Office of the Attorney General of Montana  
Justice Building  
215 N. Sanders Street  
P.O. Box 201401  
Helena, MT 59620-1401

Office of the Attorney General of Nevada  
100 North Carson St.  
Carson City, NV 89701

Office of the Attorney General of New Jersey  
RJ Hughes Justice Complex  
25 Market St., Box 080  
Trenton, NJ 08625-0080

CAFA Coordinator  
Office of the Attorney General of New York  
28 Liberty St., 15th FL  
New York, NY 10005

Office of the Attorney General of Kentucky  
700 Capitol Ave., Ste. 118  
Frankfort, KY 40601

Office of the Attorney General of Maine  
6 State House Station  
Augusta, ME 04333

Office of the Attorney General of Massachusetts  
ATTN: CAFA Coordinator/General Counsel's  
Office  
One Ashburton Place  
Boston, MA 02108-1518

Office of the Attorney General of Minnesota  
445 Minnesota Street, Suite 1400  
St. Paul, MN 55101-2131

Missouri Attorney General's Office of Missouri  
Supreme Court Building  
207 W. High St.  
P.O. Box 899  
Jefferson City, MO 65102

Office of the Attorney General of Nebraska  
2115 State Capitol  
P.O. Box 98920  
Lincoln, NE 68509

Office of the Attorney General of  
New Hampshire  
33 Capitol Street  
Concord, NH 03301

Office of the Attorney General of New Mexico  
408 Galisteo Street  
Villagra Building  
Santa Fe, NM 87501

Office of the Attorney General North Carolina  
9001 Mail Service Center  
Raleigh, NC 27699-9001

Office of the Attorney General of North Dakota  
State Capitol  
600 E. Boulevard Ave. Dept. 125  
Bismarck, ND 58505

Office of the Attorney General of Oklahoma  
313 NE 21st Street  
Oklahoma City, OK 73105

Office of the Attorney General of Pennsylvania  
16th Floor, Strawberry Square  
Harrisburg, PA 17120

Office of the Attorney General of Rhode Island  
150 South Main Street  
Providence, RI 02903

Office of the Attorney General of South Dakota  
1302 E. Hwy 14, Suite 1  
Pierre, SD 57501-8501

Office of the Attorney General of Texas  
P.O. Box 12548  
Austin, TX 78711-2548

Office of the Attorney General of Vermont  
109 State Street  
Montpelier, VT 05609-1001

Office of the Attorney General of Washington  
1125 Washington Street SE  
PO Box 40100  
Olympia, WA 98504-0100

Office of the Attorney General of Wisconsin  
Wisconsin Department of Justice  
P.O. Box 7857  
Madison, WI 53707-7857

Office of the Attorney General of Ohio  
State Office Tower  
30 E. Broad Street, 14th Fl.  
Columbus, OH 43215

Office of the Attorney General of Oregon  
Oregon Department of Justice  
1162 Court Street NE  
Salem, OR 97301-4096

Office of the Attorney General of Puerto Rico  
Puerto Rico Department of Justice  
PO Box 9020192  
San Juan, PR 00902-0192

Office of the Attorney General of South Carolina  
P.O. Box 11549  
Columbia, SC 29211

Office of the Attorney General of Tennessee  
P.O. Box 20207  
Nashville, TN 37202-0207

Office of the Attorney General of Utah  
P.O. Box 142320  
Salt Lake City, UT 84114-2320

Office of the Attorney General of Virginia  
202 North Ninth Street  
Richmond, VA 23219

Office of the Attorney General of West Virginia  
State Capital Complex Building 1  
Room E-26  
Charleston, WV 25305

Office of the Attorney General of Wyoming  
Kendrick Building  
2320 Capitol Avenue  
Cheyenne, WY 82002

**EXHIBIT B**

<b>Jurisdiction</b>	<b>Estimated Number of Eligible Vehicles Currently Registered*</b>	<b>Percentage of Total</b>
Alabama	979	1.00%
Alaska	430	0.44%
Arizona	2,535	2.58%
Arkansas	1,047	1.06%
California	13,324	13.55%
Colorado	2,974	3.02%
Connecticut	588	0.60%
DC	32	0.03%
Delaware	212	0.22%
Florida	5,317	5.41%
Georgia	2,409	2.45%
Guam**	10	0.01%
Hawaii	178	0.18%
Idaho	1,443	1.47%
Illinois	2,750	2.80%
Indiana	1,489	1.51%
Iowa	1,387	1.41%
Kansas	1,108	1.13%
Kentucky	1,062	1.08%
Louisiana	1,607	1.63%
Maine	461	0.47%
Maryland	1,213	1.23%
Massachusetts	926	0.94%
Michigan	2,342	2.38%
Minnesota	1,697	1.73%
Mississippi	765	0.78%
Missouri	1,861	1.89%
Montana	1,251	1.27%
Nebraska	899	0.91%
Nevada	1,199	1.22%
New Hampshire	475	0.48%
New Jersey	1,229	1.25%
New Mexico	907	0.92%
New York	2,841	2.89%
North Carolina	2,408	2.45%
North Dakota	573	0.58%

<b>Jurisdiction</b>	<b>Estimated Number of Eligible Vehicles Currently Registered*</b>	<b>Percentage of Total</b>
Ohio	1,902	1.93%
Oklahoma	1,962	1.99%
Oregon	2,451	2.49%
Pennsylvania	2,383	2.42%
Puerto Rico	147	0.15%
Rhode Island	153	0.16%
South Carolina	1,193	1.21%
South Dakota	700	0.71%
Tennessee	1,426	1.45%
Texas	13,023	13.24%
Utah	1,967	2.00%
Vermont	258	0.26%
Virginia	1,790	1.82%
Washington	3,373	3.43%
West Virginia	524	0.53%
Wisconsin	2,444	2.48%
Wyoming	732	0.74%

\*Based on available registration data as of October 1, 2018.

\*\*Based on retail sales data.

# Attachment 2

## Official Court-Approved Legal Notice

*Settlements with Ram and Jeep EcoDiesel Vehicle Owners/Lesseees, the Environmental Protection Agency, and the California Air Resources Board*

You are receiving this notice as an **owner, former owner, lessee, or former lessee** of one of the Fiat Chrysler EcoDiesel vehicles listed below. You may be eligible for cash benefits under a class action settlement.

**Ram 1500  
EcoDiesel**

Model Years  
2014-2016

**Jeep Grand  
Cherokee EcoDiesel**

Model Years  
2014-2016

## Settlement Benefits

### GET PAID CASH

most owners get \$3,075; most lessees get \$990

+

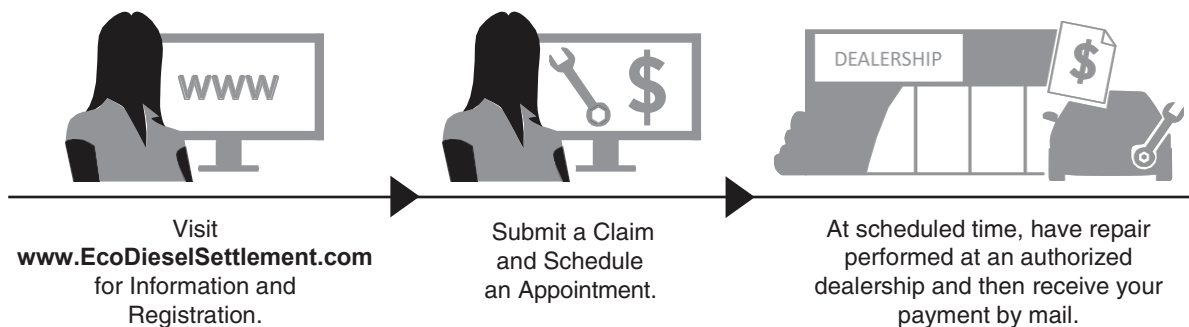
### GET YOUR VEHICLE FIXED

to comply with emissions standards

+

### RECEIVE A COMPREHENSIVE EXTENDED WARRANTY

## How It Works



## Your Rights, Next Steps, & Important Dates

The Settlements collectively provide cash compensation, a vehicle repair, and a comprehensive extended warranty. **If you are a current owner or current lessee, you must submit a claim and receive the repair to be eligible for compensation.** You can have your vehicle repaired and receive the extended warranty prior to or after making a claim, but you will not be eligible for compensation until you submit your claim.

The Court will hold a hearing on **May 3, 2019** and will decide whether to approve the Settlements on or after that date.

Fiat Chrysler will begin processing claims once the Court approves the Settlements. This notice is being sent to you prior to that date to give you time to decide whether to participate in the claims process. You will be notified again once you can start submitting claim forms and documentation. In the meantime, claim forms are available now at [www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com), and you can also sign up for e-mail updates at [www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com).

All current owners and current lessees must submit a valid claim within **21 months** of the Court's final approval of the Settlements to participate. If you are a Former Owner or Former Lessee, you must submit your valid claim within **90 days** of the Court's final approval of the Settlements. Please visit the settlement website below for additional information about important dates and deadlines.

You may object or exclude yourself from the Class Action Settlement by **April 15, 2019**. If you object, you will still be a member of the Class (if you are otherwise eligible) and must submit a claim to receive cash compensation. If you stay in the Class Action Settlement, you are eligible to receive benefits and cash and cannot sue Fiat Chrysler or Bosch for the claims being resolved by the Settlement.

Attorneys representing the Class will request Court approval for \$59 million in attorneys' fees and \$7 million in costs. Any such fees and costs awarded by the Court will be paid separately by Fiat Chrysler and Bosch and will not reduce your compensation.

**Visit [www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com) for more details on the Class Action Settlement, to register, and to review your rights and options.**

**[www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com) 1-833-280-4748**

Jeep Grand Cherokee and Ram 1500 EcoDiesel Emissions Settlements  
c/o Settlement Administrator  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

PRESORTED  
FIRST CLASS MAIL  
U.S. POSTAGE PAID  
BELLMAWR, NJ  
PERMIT #247

**IMPORTANT LEGAL INFORMATION**

**Electronic Service  
Requested**

**Official Court-Approved Legal Notice**



**2014-2016**  
**Jeep Grand Cherokee EcoDiesel**  
**and Ram 1500 EcoDiesel Settlements**

# Attachment 3

## Official Court-Approved Legal Notice

*Settlements with Ram and Jeep EcoDiesel Vehicle Owners/Lessees, the Environmental Protection Agency, and the California Air Resources Board*

You are receiving this notice as an **owner, former owner, lessee, or former lessee** of one of the Fiat Chrysler EcoDiesel vehicles listed below. You may be eligible for cash benefits under a class action settlement.

Ram 1500  
3.0L EcoDiesel

Model Years  
2014-2016

Jeep Grand  
Cherokee 3.0L EcoDiesel

Model Years  
2014-2016

### Settlement Benefits

#### **GET PAID CASH**

most owners get \$3,075; most lessees get \$990

+

#### **GET YOUR VEHICLE FIXED**

to comply with emissions standards

+

#### **RECEIVE A COMPREHENSIVE EXTENDED WARRANTY**

### How It Works



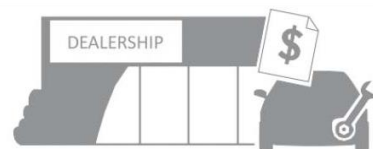
#### **Step 1**

Visit  
[www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com)  
for Information and Registration.



#### **Step 2**

Submit a Claim and  
Schedule an Appointment



#### **Step 3**

At scheduled time, have repair  
performed at an authorized  
dealership and then receive  
your payment by mail.

### Your Rights, Next Steps, & Important Dates

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[www.EcoDieselSettlement.com](http://www.EcoDieselSettlement.com) 1-833-280-4748


<<First Name>> <<Last Name>> Notice ID: <<NoticeID>>

[Unsubscribe](#)

# Attachment 4

 **EcoDiesel Emissions Settlement ... Administrator**  
Sponsored · 🌐


Learn more about new settlements announced for Ram 1500 EcoDiesels.




ECODIESELSETTLEMENT.COM  
**EcoDiesel Settlements**  
Visit the Settlement Website

[LEARN MORE](#)

👍 Like    💬 Comment    ➦ Share

 **EcoDiesel Emissions Settlement ... Administrator**  
Sponsored · 🌐

Learn more about new settlements announced for Jeep Grand Cherokee EcoDiesels.



ECODIESELSETTLEMENT.COM  
**EcoDiesel Settlements**  
Visit the Settlement Website

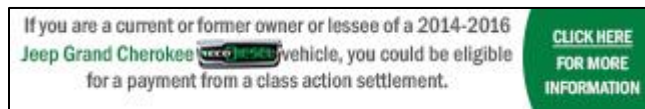
[LEARN MORE](#)

👍 Like    💬 Comment    ➦ Share

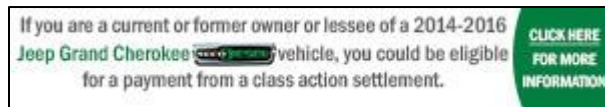
# Attachment 5

**Jeep Banner Ads – All Interactive Advertising Bureau (“IAB”) Sizes**

1. 320x50



2. 300x50



3. 728x90



4. 300x250



5. 300x600

If you are a current or  
former owner or  
lessee of a  
2014-2016  
**Jeep Grand Cherokee**  
  
vehicle, you could  
be eligible for a  
payment from a class  
action settlement.

[CLICK HERE](#)  
FOR MORE INFORMATION

6. 160x600

If you are a  
current or  
former owner  
or lessee of a  
2014-2016  
**Jeep Grand  
Cherokee**

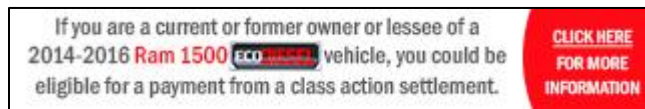


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a class action  
settlement.

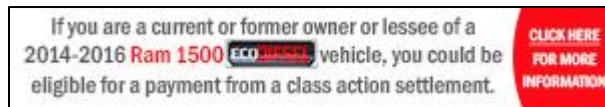
[CLICK HERE](#)  
FOR MORE  
INFORMATION

**Ram 1500 Banner Ads – All Interactive Advertising Bureau (“IAB”) Sizes**

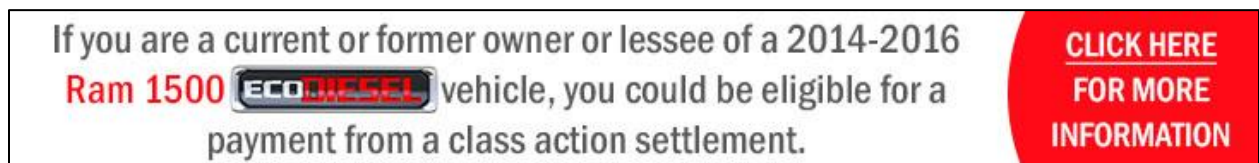
1. 320x50



2. 300x50



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4. 300x250



5. 300x600

If you are a current or  
former owner or  
lessee of a  
2014-2016

**Ram 1500**



vehicle, you could  
be eligible for a  
payment from a class  
action settlement.

[CLICK HERE](#)  
FOR MORE INFORMATION

6. 160x600

If you are a  
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former owner  
or lessee of a  
2014-2016

**Ram 1500**

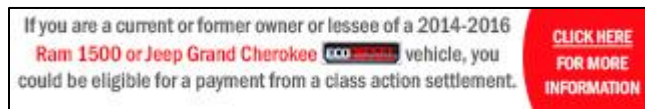


vehicle, you  
could be  
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a class action  
settlement.

**CLICK HERE**  
**FOR MORE**  
**INFORMATION**

**Jeep & Ram 1500 Banner Ads – All Interactive Advertising Bureau (“IAB”) Sizes**

1. 320x50



2. 300x50



3. 728x90



4. 300x250



5. 300x600

If you are a current or  
former owner or  
lessee of a  
2014-2016

**Ram 1500 or Jeep  
Grand Cherokee**




vehicle, you could  
be eligible for a  
payment from a class  
action settlement.

**[CLICK HERE](#)  
FOR MORE INFORMATION**

6. 160x600

If you are a  
current or former  
owner or lessee  
of a 2014-2016  
**Ram 1500 or  
Jeep Grand  
Cherokee**



vehicle, you  
could be eligible  
for a payment  
from a class  
action  
settlement.

**CLICK HERE  
FOR MORE  
INFORMATION**

# Attachment 6

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**Jeep Grand  
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Model Years  
2014-2016

## Settlement Benefits

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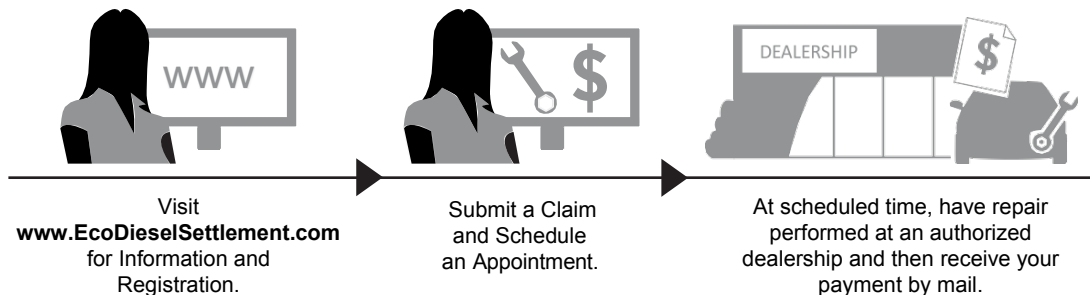
### GET YOUR VEHICLE FIXED

to comply with emissions standards

+

### RECEIVE A COMPREHENSIVE EXTENDED WARRANTY

## How It Works



## Your Rights, Next Steps, & Important Dates

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